

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ROOT INC., *et al.*,**

**Plaintiffs,**

**v.**

**BRINSON CALEB SILVER *et al.*,**

**Defendants.**

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**Case No. 2:23-cv-512**

**Judge Sarah D. Morrison**

**Magistrate Judge Elizabeth P. Deavers**

**PLAINTIFFS, DEFENDANT QUANTASY & ASSOCIATES, LLC, DEFENDANT  
WILLIAM CAMPBELL, AND PROPOSED NEW DEFENDANT QUANTASY, LLC'S  
JOINT STIPULATIONS REGARDING SECOND AMENDED COMPLAINT AND  
MOTION TO DISMISS BREIFING**

Plaintiffs Root, Inc., Caret Holdings, Inc., and Root Insurance Agency, LLC (collectively, “Plaintiffs” or “Root”), Defendants Quantasy & Associates, LLC, William Campbell, and Proposed New Defendant Quantasy, LLC stipulate to the following:

- On February 14, 2023, Root filed its First Amended Verified Complaint for Damages (“First Amended Complaint”) against Quantasy & Associates, LLC and William Campbell, among other Defendants.
- On May 11, 2023, Quantasy & Associates, LLC and William Campbell filed a Motion to Dismiss Plaintiffs’ First Verified Amended Complaint (the “Motion to Dismiss”) (ECF No. 94).
- On June 22, 2023, Root filed a Response in Opposition to The Motion to Dismiss Filed By Quantasy & Associates, LLC and William Campbell (ECF No. 135).
- On July 13, 2023, Quantasy & Associates, LLC and William Campbell filed their Reply in Support of Their Motion to Dismiss Complaint (ECF No. 145).

- Contemporaneously with this Stipulation, Root is filing a motion for leave to file a Second Amended Complaint.
- Quantasy & Associates, LLC, William Campbell, and Quantasy, LLC consent to the filing of the Second Amended Complaint. By consenting to the filing of Second Amended Complaint, Quantasy & Associates, LLC, William Campbell, and Quantasy, LLC do not waive and/or limit their rights under the Federal Rules of Civil Procedure with respect to the Second Amended Complaint outside of the stipulations herein.
- The only difference between the First Amended Complaint and the Second Amended Complaint is the addition of Defendant Quantasy, LLC.
- The allegations and claims in the Second Amended Complaint concerning Quantasy & Associates, LLC and Quantasy, LLC are identical.
- To avoid unnecessary and duplicative briefing under Federal Rule 12, the Parties hereto stipulate that the Motion to Dismiss, Response, and Reply (ECF Nos. 94, 135, 145, respectively) are applicable to the Second Amended Complaint.
- The Parties hereto further stipulate that the terms “Quantasy & Associates, LLC” and “Quantasy” in the Motion to Dismiss, Response, and Reply should be read to include both Quantasy & Associates, LLC and Quantasy, LLC. Therefore, the Motion to Dismiss and Reply may be considered filed on behalf of Quantasy & Associates, LLC, Quantasy, LLC, and William Campbell.
- This Stipulation eliminates the need for Quantasy & Associates, LLC, Quantasy, LLC, or William Campbell to file new responsive pleadings or motions.
- The Court may therefore decide the Motion to Dismiss on the previous filings (ECF Nos. 94, 135, 145). The Parties hereto stipulate that the Court’s decision on the Motion to

Dismiss with respect to Quantasy will apply to both Quantasy & Associates, LLC and Quantasy, LLC.

**SO STIPULATED:**

/s/ William D. Kloss, Jr.

William D. Kloss, Jr. (0040854)  
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*Counsel for Quantasy & Associates, LLC,  
Quantasy, LLC, and William Campbell*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served on this 6th day of September 2023, via CM/ECF upon all counsel of record for Quantasy & Associates, LLC, Quantasy, LLC and William Campbell, and via regular mail upon Paige McDaniel, Brinson Caleb Silver, Collateral Damage, LLC, and Eclipse Home Design, LLC as set forth below:

**Paige McDaniel**

5576 Alexanders Lake Rd.  
Stockbridge, GA 30281

**Brinson Caleb Silver**

Butler County Jail  
Attn. Brinson Caleb Silver  
Inmate # 303850  
705 Hanover Street  
Hamilton, OH 45011

**Collateral Damage, LLC**

101 N. Brand Blvd.  
11th Floor  
Glendale, CA 91203

**Eclipse Home Design, LLC**

651 N. Broad Street  
Suite 201  
Middletown, DE 19709

/s/ William D. Kloss, Jr.

William D. Kloss, Jr. (0040854)